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***Attorneys for Defendant***  
**LEFRAK ORGANIZATION, INC.**

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

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21 MC 102 (AKH)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PEDRO GARCIA and GLADYS GARCIA,

Case No.:  
07-CV-5702

Plaintiffs,

-against-

CITY OF NEW YORK, BANKERS TRUST  
COMPANY, DEUTSCHE BANK TRUST COMPANY  
AMERICAS, DEUTSCHE BANK TRUST  
COMPANY, DEUTSCHE BANK TRUST  
CORPORATION, THE BANK OF NEW YORK  
TRUST COMPANY NA, TISHMAN INTERIORS  
CORPORATION and BT PRIVATE CLIENTS CORP.,  
TULLY CONSTRUCTION CO., INC., TULLY  
INDUSTRIES, VERIZON NEW YORK, INC., NEW  
YORK TELEPHONE COMPANY, EMPIRE STATE  
PROPERTIES, INC. and LEFRAK ORGANIZATION  
INC.,

**NOTICE OF ADOPTION OF  
ANSWER TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

Defendants.

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**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as  
and for its response to the allegations set forth in the Complaint by Adoption (Check-Off  
Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts  
its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World*

*Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 24, 2007

Yours etc.,

**HARRIS BEACH PLLC**



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Brian A. Bender, Esq. (BAB-0218)

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ORGANIZATION, INC.**

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